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Attorneys for Plaintiff

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

**ST. MATTHEW'S UNIVERSITY  
(CAYMAN) LTD., a Cayman Islands  
company,**

Plaintiff,

vs.

**SABA UNIVERSITY SCHOOL OF  
MEDICINE FOUNDATION, a  
Netherland-Antilles company, et al,**

Defendants.

Case No. CV-S-05-0848-BES

**DECLARATION OF KARL  
KRONENBERGER, ESQ.**

**DECLARATION OF KARL KRONENBERGER, ESQ.**

I, Karl S. Kronenberger, counsel of record for Plaintiff St. Matthew's University School of Medicine ("ST. MATTHEW'S") in the above-captioned action, do hereby affirm and declare true and correct copies of the following documents are attached to this declaration as the exhibits indicated:

1. At Exhibit A, account information for the email accounts presaaimg@hotmail.com, from documents received from Microsoft Corporation, which is the operator of Hotmail. Additionally, Exhibit A contains two full pages of IP addresses, dates and times of account logins for this Hotmail account. The documents in Exhibit A reflect only a portion of the documents provided to Plaintiff by Microsoft, and the documents have been annotated by Plaintiff for the purpose of Plaintiff's opposition to Defendants' Motion to Dismiss. The pages included in Exhibit A are true and accurate copies of the corresponding original pages Plaintiff received from Microsoft Corporation in response to Plaintiff's subpoena.
2. At Exhibit B, information on one IP address from the annotation in Exhibit A, from documents provided by Level3 Communications, LLC, which owns the IP address reflected at the annotation in Exhibit A. Specifically, this information from Level3 Communications contains a listing of the usage of one IP address, matching the Hotmail login IP address, date and times.<sup>1</sup> This information from Level3 Communications shows that the automatically generated username ju0007057197@jweb-level23.juno.com was used to log in for Internet access, and that the telephone number used to dial in to the Internet connection was (978) 6863-2237. The documents in Exhibit B reflect only a portion of the documents provided to Plaintiff by Level3 Communications, and the documents have been annotated by Plaintiff for

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<sup>1</sup> For conversions for UTC time (formerly known as GMT), see <http://www.time.gov> and <http://www.time.gov/about.html>.

1 the purpose of Plaintiff's opposition to Defendants' Motions to Dismiss. The  
2 pages included in Exhibit B are true and accurate copies of the  
3 corresponding original pages Plaintiff received from Level3 Communications  
4 in response to Plaintiff's subpoena.

5 3. At Exhibit C, information on one IP address from the annotation in Exhibit A,  
6 from documents provided by United Online, which owns the IP address  
7 reflected at the annotation in Exhibit A. Specifically, this information from  
8 United Online contains a listing of the usage of one IP address, matching  
9 the Hotmail login IP address, date and times. This information from United  
10 Online shows that the username crocdoc2004 was used to log in for  
11 Internet access, and that the telephone number used to dial in to the  
12 Internet connection was (978) 632-2237. The documents in Exhibit C  
13 reflect only a portion of the documents provided to Plaintiff by Level3  
14 Communications, and the documents have been annotated by Plaintiff for  
15 the purpose of Plaintiff's opposition to Defendants' Motions to Dismiss. The  
16 pages included in Exhibit B are true and accurate copies of the  
17 corresponding original pages Plaintiff received from United Online in  
18 response to Plaintiff's subpoena.

19 4. At Exhibit D, information on one IP address from the annotation in Exhibit A,  
20 from documents provided by Verizon, which owns the IP address reflected  
21 at the annotation in Exhibit A. The account information provided by Verizon  
22 reveals the name of Defendant Pankaj Desai as the owner and operator of  
23 the account. The documents in Exhibit D reflect only a portion of the  
24 documents provided to Plaintiff by Verizon, and the documents have been  
25 annotated by Plaintiff for the purpose of Plaintiff's opposition to Defendants'  
26 Motion to Dismiss, and portions have been redacted for privacy reasons.  
27 Except for the redactions, the pages included in Exhibit D are true and  
28 accurate copies of the corresponding original pages Plaintiff received from


Verizon in response to Plaintiff's subpoena.

5. On April 24, 2006, I entered the phrase "(978) 632-2237" into Google, Inc.'s search engine at www.google.com. The search returned the following result: "Education Information Consultants, Inc. – (978) 632-2237 – 63 Walnut St, Gardner, MA 01440." Attached as Exhibit E is a true and correct copy of the search result page from Google.

6. On April 24, 2006, I printed eight pages from the Defendant SABA's website at www.saba.edu, listing Defendant DESAI as a member of the Board of Trustees and listing SABA graduates who are in residency programs in Nevada. Attached as Exhibit F are true and correct copies of these pages from the SABA website.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

DATED: April 24, 2005

  
Karl Kronenberger

CERTIFICATE OF SERVICE

I am a resident of the state of California, over the age of eighteen years and not a party to this action. My business address is 220 Montgomery Street, Suite 1920, San Francisco, California, 94104.

On April 24, 2006, I served the following document(s):

1. DECLARATION OF KARL KRONEBERGER, ESQ.

on the parties listed below as follows:

NATHAN REINMILLER, ESQ

Alverson Taylor Mortensen & Sanders  
7401 West Charleston Blvd  
Las Vegas, NV 89117  
Fax: (702) 385-7000

☐

BY FACSIMILE MACHINE (FAX), by personally transmitting a true copy thereof via an electronic facsimile machine to the fax number listed herein.

☒

BY FIRST CLASS MAIL, by placing a true copy thereof in a sealed envelope, with postage thereon fully prepaid, for collection and mailing, in San Francisco, California, following ordinary business practices, which is deposited with the US Postal Service the same day as it is placed for processing.

☐

BY PERSONAL SERVICE, by personally delivering a true copy thereof to the addressee(s) listed herein at the location listed herein.

☐

BY OVERNIGHT DELIVERY containing a true copy thereof to the addressee(s) listed herein at the location listed herein.

☐

BY EMAIL to the addresses listed above.

☐

(State) I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

☒

(Federal) I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

  
Jonathan S. Tam

## **TABLE OF EXHIBITS**

### **EXHIBIT A**

Records From Microsoft Showing IP Numbers and Dates and Times of Logins to AAIMG Hotmail Account

### **EXHIBIT B**

Records From Level 3 Evidencing Use of EIC, INC. and EIC, LLC's Phone Number to Log Into AAIMG Hotmail Account

### **EXHIBIT C**

Records From United Online Evidencing Use of EIC, INC. and EIC, LLC's Phone Number to Log Into AAIMG Hotmail Account

### **EXHIBIT D**

Record of DESAI's Account as One of the Accounts Used to Log Into the AAIMG Hotmail Account

### **EXHIBIT E**

Google Search Result of "(978) 632-2237"

### **EXHIBIT F**

SABA's Website Showing Defendant DESAI as a Member of the Board of Trustees, and Showing SABA Students in Residency Programs in Nevada

**EXHIBIT A**

Records From Microsoft Showing IP Numbers and Dates and Times of Logins to  
AAIMG Hotmail Account

User Info	
Field	Value
Login	presaaimg@hotmail.com
First Name	thomas
Last Name	moore
State	Nevada
Zip	89706
Country	US
Timezone	America/Denver
Registered from IP	149.152.89.168
Date Registered	10/25/2000 9:04:13 AM
Reply To Address	presaaimg@hotmail.com
This Account Forwards to the Following Accounts	
Accounts Forwarding to This Account	
Init Locale	EN_US

MS/SUB  
Confidential 0154



History Info		
IP	Date {Pacific}	Pass/Fail
149.152.89.168	10/25/2000 9:04:16 AM (PDT)	initialize
149.152.89.168	10/25/2000 9:04:47 AM (PDT)	pass
171.75.169.112	7/29/2003 3:21:31 PM (PDT)	pass
204.94.250.10	9/15/2004 7:05:34 PM (PDT)	pass
204.94.250.10	9/16/2004 6:15:02 PM (PDT)	pass
141.157.69.150	9/17/2004 6:34:06 PM (PDT)	pass
151.196.177.15	9/18/2004 5:47:15 AM (PDT)	pass
151.196.177.15	9/18/2004 6:01:24 AM (PDT)	pass
208.42.62.21	9/18/2004 8:11:27 AM (PDT)	pass
4.156.63.42	9/19/2004 7:50:39 AM (PDT)	pass
4.156.150.1	9/19/2004 5:13:48 PM (PDT)	pass
4.156.150.1	9/19/2004 5:14:40 PM (PDT)	pass
4.156.150.1	9/19/2004 6:02:50 PM (PDT)	pass
4.156.150.1	9/19/2004 6:03:47 PM (PDT)	pass
4.156.120.222	9/19/2004 8:13:00 PM (PDT)	pass
4.156.93.215	9/21/2004 8:06:52 PM (PDT)	pass
66.2.72.57	9/21/2004 8:30:06 PM (PDT)	pass
66.2.72.2	9/22/2004 6:42:36 AM (PDT)	pass
66.2.72.26	9/22/2004 9:35:27 AM (PDT)	pass
205.188.117.18	9/23/2004 4:44:45 PM (PDT)	pass
69.65.155.66	9/25/2004 8:29:38 PM (PDT)	pass
69.65.155.66	9/25/2004 8:59:09 PM (PDT)	pass
69.65.155.66	9/25/2004 9:07:49 PM (PDT)	pass
69.65.155.66	10/1/2004 2:59:01 PM (PDT)	pass
206.82.138.69	10/8/2004 10:40:12 AM (PDT)	pass
206.82.138.69	10/8/2004 10:43:27 AM (PDT)	pass
4.156.129.152	10/11/2004 8:34:14 PM (PDT)	pass
4.156.120.169	10/17/2004 3:28:18 PM (PDT)	pass
4.156.129.178	10/17/2004 4:42:59 PM (PDT)	pass
152.163.100.67	10/17/2004 8:27:41 PM (PDT)	pass
141.154.82.94	10/19/2004 10:31:02 AM (PDT)	pass
4.156.240.77	10/19/2004 4:55:57 PM (PDT)	pass
66.2.72.34	10/19/2004 6:13:14 PM (PDT)	pass
4.156.198.215	10/20/2004 4:54:12 PM (PDT)	pass
4.154.252.73	10/23/2004 6:45:02 AM (PDT)	pass
152.163.100.13	10/24/2004 8:56:14 PM (PDT)	pass
68.56.185.80	10/27/2004 8:56:02 PM (PDT)	pass
68.56.185.80	10/30/2004 7:14:16 AM (PDT)	pass
68.56.185.80	11/3/2004 6:47:00 AM (PST)	pass
64.12.116.200	11/4/2004 1:44:46 PM (PST)	pass
12.105.246.85	11/5/2004 1:08:05 PM (PST)	pass
12.105.246.85	11/5/2004 1:19:30 PM (PST)	pass
12.105.246.90	11/6/2004 11:08:12 AM (PST)	pass
12.105.246.90	11/6/2004 11:38:46 AM (PST)	pass
198.81.26.103	11/7/2004 9:58:09 AM (PST)	pass

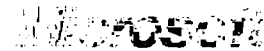
MS/SUB  
Confidential 0155

69.50.64.6	5/9/2005 1:12:33 PM (PDT)	pass
208.158.14.56	5/13/2005 8:36:29 AM (PDT)	pass
208.158.14.56	5/13/2005 8:36:29 AM (PDT)	pass
208.158.14.56	5/13/2005 8:39:34 AM (PDT)	pass
208.158.14.56	5/13/2005 8:39:34 AM (PDT)	pass
209.239.73.242	5/17/2005 2:32:43 PM (PDT)	pass
209.239.73.242	5/17/2005 2:32:43 PM (PDT)	pass
200.7.35.6	5/19/2005 6:22:59 AM (PDT)	pass
200.7.35.6	5/19/2005 6:22:59 AM (PDT)	pass
200.7.35.6	5/19/2005 6:30:12 AM (PDT)	pass
200.7.35.6	5/19/2005 6:30:12 AM (PDT)	pass
200.7.35.6	5/19/2005 6:32:20 AM (PDT)	pass
200.7.35.6	5/19/2005 6:32:20 AM (PDT)	pass
4.156.120.245	5/22/2005 11:57:55 AM (PDT)	pass
4.156.120.245	5/22/2005 11:57:55 AM (PDT)	pass
→ 4.156.96.200 ←	5/27/2005 10:47:36 AM (PDT)	pass
→ 4.156.96.200 ←	5/27/2005 10:47:36 AM (PDT)	pass
69.179.80.131	5/31/2005 11:15:09 AM (PDT)	pass
69.179.80.131	5/31/2005 11:15:09 AM (PDT)	pass
69.179.80.131	5/31/2005 11:16:54 AM (PDT)	pass
69.179.80.131	5/31/2005 11:16:54 AM (PDT)	pass
69.179.80.131	5/31/2005 3:08:54 PM (PDT)	pass
69.179.80.131	5/31/2005 3:08:54 PM (PDT)	pass
69.179.80.131	5/31/2005 3:10:56 PM (PDT)	pass
69.179.80.131	5/31/2005 3:10:56 PM (PDT)	pass
69.179.80.131	5/31/2005 3:25:46 PM (PDT)	pass
69.179.80.131	5/31/2005 3:25:46 PM (PDT)	pass
69.179.80.131	5/31/2005 3:27:11 PM (PDT)	pass
69.179.80.131	5/31/2005 3:27:11 PM (PDT)	pass
69.179.80.131	6/1/2005 11:02:13 AM (PDT)	pass
69.179.80.131	6/1/2005 11:02:13 AM (PDT)	pass
69.179.80.131	6/1/2005 3:24:13 PM (PDT)	pass
69.179.80.131	6/1/2005 3:24:13 PM (PDT)	pass
69.179.80.131	6/2/2005 1:10:32 PM (PDT)	pass
69.179.80.131	6/2/2005 1:10:32 PM (PDT)	pass
69.179.80.131	6/7/2005 3:37:54 PM (PDT)	pass
69.179.80.131	6/7/2005 3:37:54 PM (PDT)	pass
69.179.80.131	6/7/2005 3:40:16 PM (PDT)	pass
69.179.80.131	6/7/2005 3:40:16 PM (PDT)	pass
69.179.80.131	6/7/2005 3:43:24 PM (PDT)	pass
69.179.80.131	6/7/2005 3:43:24 PM (PDT)	pass
69.179.80.131	6/8/2005 3:28:18 PM (PDT)	pass
69.179.80.131	6/8/2005 3:28:18 PM (PDT)	pass
69.179.80.131	6/9/2005 6:31:28 AM (PDT)	pass
69.179.80.131	6/9/2005 6:31:28 AM (PDT)	pass
69.179.80.131	6/9/2005 8:21:54 AM (PDT)	pass
69.179.80.131	6/9/2005 8:21:54 AM (PDT)	pass

MS/SUB  
Confidential 0158

Microsoft Corporation  
One Microsoft Way  
Redmond, WA 98052-6399

Tel: 425 882 8080  
Fax: 425 936 7329  
<http://www.microsoft.com/>



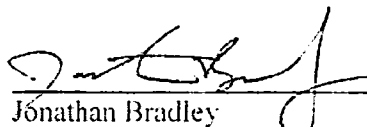
## CERTIFICATION OF AUTHENTICITY

I, Jonathan Bradley, state as follows:

1. I am over the age of 18, I am competent to testify regarding the matters set forth below and I make this declaration based upon personal knowledge.
2. I am one of the records custodians for Microsoft Corporation, including its Hotmail service(s) (the "Service"). I am familiar with the electronic filing system for maintaining subscriber information for the Service.
3. When a new subscriber registers for the Service, the subscriber is required to enter certain information, including the name and address of the subscriber ("Subscriber Information").
4. In the ordinary course of the Service's business, the Service maintains an electronic record of the Subscriber Information ("Subscriber Information Record"). Subscriber Information Records are made at the time that a new subscriber registers for the Service.
5. In the ordinary course of the Service's business, the Service maintains an electronic record of certain data with respect to subscriber accounts, including: registration information provided by the user and Internet Protocol Logs which list the date, time and Internet Protocol address for each account session log-in (collectively, "Subscriber Logs"). Subscriber Logs are made contemporaneously with the events that they document. Subscriber Logs are kept for a limited time and may not be available as they are deleted in the course of routine document storage maintenance.
6. In the regular course of my duties as custodian of records, I obtained a copy of the Subscriber Information Record and Subscriber Logs for the Service account(s): [execsecaaimg@hotmail.com](mailto:execsecaaimg@hotmail.com) and [presaaimg@hotmail.com](mailto:presaaimg@hotmail.com). These records included the information in the pages labeled MS/SUB 0073-0076-0154-0160, which have been requested by civil subpoena in: *St. Matthews University v. AAIMG*.

I declare, under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct to the best of my knowledge and belief.

DATED August 22, 2005, in Redmond, Washington.

  
Jonathan Bradley  
Custodian of Records, Microsoft Corporation

**EXHIBIT B**

Records From Level 3 Evidencing Use of EIC, INC. and EIC, LLC's Phone Number to  
Log Into AAIMG Hotmail Account

Sep-21-2005 02:50 PM 7208883303  
09/21/05 13:58 FAX 720888330315/19  
LEVEL 3 COMMUNICATIONS

015/019

4.156.15.73 2005-05-23  
IP Address: 4.156.15.73  
Start Time: 23-MAY-2005 23:23:52  
Stop Time: 23-MAY-2005 23:58:44  
User Name: saba@tiac.net  
Customer ID: earthlink::BBBB00172  
ISP: 9789194492  
ANI: 9786326836  
Session ID: 327979947

4.156.96.200 2005-05-27  
IP Address: 4.156.96.200  
Start Time: 27-MAY-2005 17:38:59  
Stop Time: 27-MAY-2005 17:52:52  
User Name: ju0007057197@jweb-level3.juno.com  
Customer ID: unitedonline::BBBC39556  
ISP: 9789194283  
ANI: 9786322237  
Session ID: 472286477

4.156.120.161 2005-05-28  
IP Address: 4.156.120.161  
Start Time: 28-MAY-2005 15:40:17  
Stop Time: 28-MAY-2005 15:58:17  
User Name: T)8IdmKR:6A1.4JU:crocdoc2004@netzero.net  
Customer ID: unitedonline::BBBC39556  
ISP: 9789194283  
ANI: 9786326836  
Session ID: 339197473

4.156.78.169 2005-06-23  
IP Address: 4.156.78.169  
Start Time: 23-JUN-2005 03:07:25  
Stop Time: 23-JUN-2005 03:57:38  
User Name: saba@tiac.net  
Customer ID: earthlink::BBBB00172  
ISP: 9789194492  
ANI: 9786326836  
Session ID: 322096107

09/21/05 13:59 FAX 7208883303

LEVEL 3 COMMUNICATIONS

018/019

DECLARATION OF RECORDS CUSTODIAN

The undersigned Custodian of Records declares and answers questions as follows:

1. State your name, job title, place of employment, and address.

Name:

Mike Keating

Title:

Security Operations Technician

Employer:

Level 3 Communications

Address:

1025 Eldorado Blvd.

Broomfield, Colorado

80021

2. In your employment, do you have custody or control of records, documents and information sought in the subpoena served herewith?

☒ Yes. ☐ No.

3. Were these records prepared in the ordinary and regular course of business, at or near the time of the event, act or correspondence?

☐ Yes. ☒ No.

4. Have any changes or alterations in these records been made since the date of origination?

☐ Yes. ☒ No.

5. Have you provided complete and true copies of the originals of these records?

☒ Yes. ☐ No.

6. Have you omitted any records, documents, or other information responsive to the subpoena served herewith that is in the possession, custody or control of the party to whom that subpoena is directed (or its attorneys or agents)?

☐ Yes. ☒ No.

If "yes," please identify with specificity any and all documents omitted:

Sep-21-2005 02:50 PM 7208883303  
09/21/05 14:00 FAX 720888330319/19  
LEVEL 3 COMMUNICATIONS

019/019

1 I declare under penalty of perjury under the laws of the United States that the  
2 foregoing is true and correct to the best of my knowledge.  
3

4  
5 Dated: 9/21/056  
7 SIGNED:

8 Michael J Keating  
9 Name: Michael J Keating  
10 Title: Security Operations Technician  
11  
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**EXHIBIT C**

Records From United Online Evidencing Use of EIC, INC. and EIC, LLC's Phone  
Number to Log Into AAIMG Hotmail Account



Sep-13-2005 05:41 PM

2/3



JUNO IS A UNITED ONLINE COMPANY



Response to subpoena crocdoc2004@netzero.net (crocdoc2004@netzero.net is displayed on our backend servers but is displayed as crocdoc2004@juno.com to the public internet and the customer)

Date responded: September 13<sup>th</sup> 2005

Member ID: crocdoc2004  
 Name: Thomas Moore  
 Join Date: October 02, 2003 17:32:35  
 IP During Registration: 67.75.22.211  
 Last Login: Aug 14, 2005 19:32:55  
 Alt email address\*: not provided  
 Address\*: 1802 N. Carson St.  
 Carson City, NV 89701  
 Phone\*: (775) 887-8853  
 (\*Provided by user)

All times mentioned are in Pacific Standard Time (GMT -08:00).

Any information provided by the subscriber is not checked for its authenticity; however all times, IP's and phone numbers that we can provide to connect are considered accurate. Any profile information not provided or left blank by the user will output as *not provided*.

Member ID	LOG IN Ligon Date	/ LOGOUT Logoff Date	RECORDS IP	Member Phone	Pop ID	Duration
crocdoc2004	05/01/2005 08:45:19	05/01/2005 08:59:45	4.156.96.224	9786326836	9789194283	14
crocdoc2004	05/03/2005 08:09:30	05/03/2005 08:19:18	4.153.17.57	0	7063410050	10
crocdoc2004	05/26/2005 21:17:47	05/26/2005 21:26:44	4.156.36.73	9786326836	9789194283	9
crocdoc2004	05/27/2005 10:38:59	05/27/2005 10:52:52	4.156.96.200	9786322237	9789194283	14
crocdoc2004	05/28/2005 08:40:15	05/28/2005 08:58:17	4.156.120.161	9786326836	9789194283	18
crocdoc2004	07/09/2005 21:18:36	07/09/2005 21:46:43	4.156.129.67	9786326836	9789194283	28
crocdoc2004	07/10/2005 19:57:45	07/10/2005 20:26:02	4.156.39.140	9786326836	9789194283	28
crocdoc2004	08/02/2005 19:22:41	08/02/2005 19:26:23	4.156.96.116	9786326836	9789194283	4
crocdoc2004	08/08/2005 18:59:02	08/08/2005 18:59:38	65.142.31.189	0	5044129535	1
crocdoc2004	08/08/2005 19:03:31	08/08/2005 19:07:38	65.135.31.135	0	5044129535	4
crocdoc2004	08/14/2005 19:29:43	08/14/2005 19:32:55	65.135.32.6	0	5044129535	3

Oct-11-2005 02:50 PM

2/3

DECLARATION OF RECORDS CUSTODIAN

The undersigned Custodian of Records declares and answers questions as follows:

1. State your name, job title, place of employment, and address.

Name:

KEVIN PAWLOSKI

Title:

Security Engineer

Employer:

Onites Online, Inc.

Address:

21301 Burbank Blvd.

Woodland Hills, CA 91367

2. In your employment, do you have custody or control of records, documents and information sought in the subpoena served herewith?

☒ Yes. ☐ No.

3. Were these records prepared in the ordinary and regular course of business, at or near the time of the event, act or correspondence?

☒ Yes. ☐ No.

4. Have any changes or alterations in these records been made since the date of origination?

☐ Yes. ☒ No.

5. Have you provided complete and true copies of the originals of these records?

☒ Yes. ☐ No.

6. Have you omitted any records, documents, or other information responsive to the subpoena served herewith that is in the possession, custody or control of the party to whom that subpoena is directed (or its attorneys or agents)?

☐ Yes. ☒ No.

If "yes," please identify with specificity any and all documents omitted:

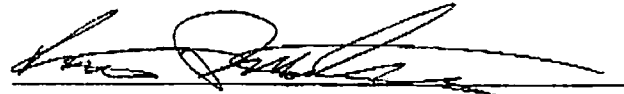
Oct-11-2005 02:50 PM

3/3

1 I declare under penalty of perjury under the laws of the United States that the  
2 foregoing is true and correct to the best of my knowledge.

3  
4  
5 Dated: 10/11/2005

6  
7 SIGNED:



8 Name: Kevin Pawlowski

9 Title: Security Engineer

**EXHIBIT D**

Record of DESAI's Account as One of the Accounts Used to Log Into the AAIMG  
Hotmail Account

Sep-29-2005 05:46 PM Kronenberger Law 4159551158  
 09/29/2005 16:57 214-513-6795 VERIZON VIO SECURITY

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Report for 141.157.69.150

Start Time	Stop Time	Duration	Caller ID	User ID	Session ID	Router Name / IP	Slot/Port
09/17/04 21:23:15	09/17/04 21:49:07	0:25:52	N/A	prdesai	000E2BB7	192.168.53.46	ADSL

Report for 151.196.177.15

Start Time	Stop Time	Duration	Caller ID	User ID	Session ID	Router Name / IP	Slot/Port
09/18/04 07:28:46	09/18/04 09:08:20	1:39:34	N/A	prdesai	00112DF7	192.168.53.46	ADSL

Overall Account Status: Active

Account History Customer Account Information Billing/Payment Information Suspend Account

VOL LOB Consumer Account Creator Agency 2WR  
 VOL Account Number AX02673931 Account Creation Date 8/27/2003  
 Verizon Encore Customer

Customer Name pankaj desai  
 Account Address 7204 CARACARA CT  
 SYKESVILLE, MD, 21784-6671  
 Daytime TN (410)549-6337 Ext Evening TN (410)549-6337 Ext  
 Fax Number EMail vze78y15@verizon.net  
 Payment Method TELCO Billed Security Code  
 Bill Cycle C22

Package Information

Status Filter Active

ONLINE CONSUMER VOL DSL / (410)549-6337

Active

Current Price \$28.95 VOL User ID vze78y15  
 Last Order Number Last Order SRD  
 VOL User Name prdesai  
 POTS Order Number POTS Dtm Date 8/27/2003  
 Next Cycle Start Date **Retrieve** Bundle Discount Applied? ☒  
 Retained in Last 6 Months? ☐ User ID Able to be Restored? ☐  
 Billed in-Arrears ☐ Location East  
 Circuit Type ATM Annual Plan ☐  
 Language Indicator English

Expanded Product Description

Order History

Package Details/Features

Market Code of Package Restricted - Honor Speed Provisioned 768 Kbps/128 Kbps  
 Mobility  
 Full Price \$28.95

Description	Start Date	End Date
30 DAY FREE DISCOUNT	8/27/2003	9/26/2003
2 months @ \$29.95 after 30dr	9/26/2003	11/25/2003

Change

Move

Reinit/Remove

Service Information

Service Address Information

panka] desai  
 7204 CARACARA CT  
 SYKESVILLE, MD, 21784-6671  
 Primary TN: (410)549-6337  
 Secondary TN: (410)549-6337  
 EMail: vze78y15

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 Fax: (415) 955-1158

Attorneys for Plaintiff

**UNITED STATES DISTRICT COURT  
 DISTRICT OF NEVADA**

**ST. MATTHEW'S UNIVERSITY  
 (CAYMAN) LTD., a Cayman Islands  
 company,**

Plaintiff,

vs.

**ASSOCIATION OF AMERICAN  
 INTERNATIONAL MEDICAL  
 GRADUATES, INC., a Nevada  
 corporation; THOMAS MOORE, M.D.  
 a.k.a. "presaaimg@hotmail.com," an  
 individual; SARAH B. WEINSTEIN a.k.a.  
 "execsecaimg@hotmail.com," an  
 individual; and RACHAEL E. SILVER,  
 an individual,**

Defendants.

Case No. CV-S-05-0848-RCJ(LRL)

**DECLARATION OF RECORDS  
 CUSTODIAN**

**TO BE FILED UNDER SEAL**

IN CONNECTION WITH THE RULE 45 SUBPOENA SERVED HERewith, this  
 "Declaration of Records Custodian" is hereby made and submitted for the purpose of the  
 authentication of the documents and information produced in response thereto.

**DECLARATION OF RECORDS CUSTODIAN**

1

Sep-29-2005 05:48 PM Kronenberger Law 4159551158  
 09/29/2005 16:57 214-513-6795 VERIZON VIO SECURITY

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### DECLARATION OF RECORDS CUSTODIAN

The undersigned Custodian of Records declares and answers questions as follows:

1. State your name, job title, place of employment, and address.

Name:

Christine M. Gardner

Title:

Network Specialist

Employer:

Verizon Internet Services Inc

Address:

4055 Corporate Drive #400

HO.GA1M52 mail code

Grapevine, Texas 76051

2. In your employment, do you have custody or control of records, documents and information sought in the subpoena served herewith?

☒ Yes. ☐ No.

3. Were these records prepared in the ordinary and regular course of business, at or near the time of the event, act or correspondence?

☒ Yes. ☐ No.

4. Have any changes or alterations in these records been made since the date of origination?

☐ Yes. ☒ No.

5. Have you provided complete and true copies of the originals of these records?

☒ Yes. ☐ No.

6. Have you omitted any records, documents, or other information responsive to the subpoena served herewith that is in the possession, custody or control of the party to whom that subpoena is directed (or its attorneys or agents)?

☐ Yes. ☒ No.

If "yes," please identify with specificity any and all documents omitted:

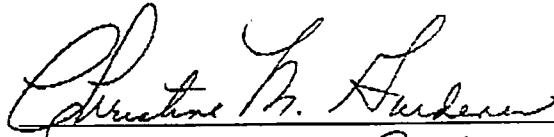
Sep-29-2005 05:48 PM Kronenberger Law 4159551158  
09/29/2005 16:57 214-513-6795 VERIZON VIO SECURITY

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1 I declare under penalty of perjury under the laws of the United States that the  
2 foregoing is true and correct to the best of my knowledge.

3  
4  
5 Dated: 9/29/2005

6  
7 SIGNED:



8 Name: Christine M. Gardenes

9 Title: Network Specialist

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DECLARATION OF RECORDS CUSTODIAN



**EXHIBIT E**

Google Search Result of "(978) 632-2237"

(978) 632-2237 - Google Search

http://www.google.com/search?sa=X&oi=fwp&pb=f&q=(978)+632...

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## Business Phonebook

Results 1 - 1 of 1 for (978) 632-2237. (0.04 seconds)

Education Information Consultants Inc - (978) 632-2237 - 63 Walnut St, Gardner, MA 01440 - [Google Maps](#) - [Yahoo! Maps](#) - [MapQuest](#)

New! Crack the Code: [Play the Da Vinci Code Quest on Google](#).

(978) 632-2237

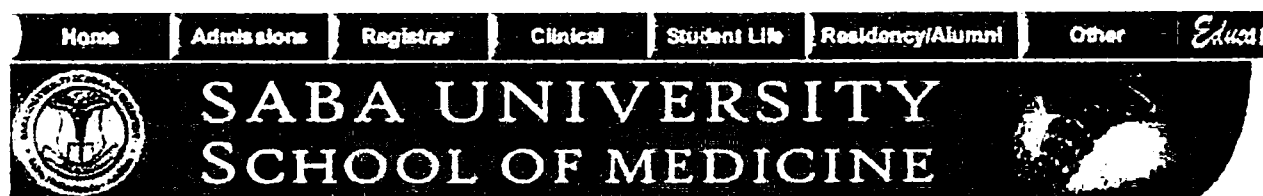
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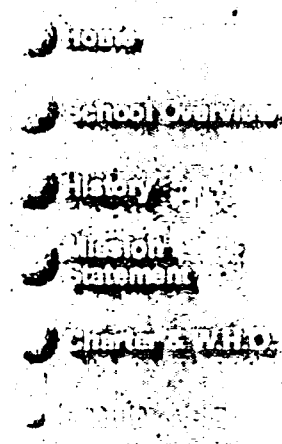
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**EXHIBIT F**

SABA's Website Showing Defendant DESAI as a Member of the Board of Trustees, and Showing SABA Students in Residency Programs in Nevada



Current Section → [Home](#) • [Faculty & Staff](#)



## FACULTY & STAFF

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David L Fredrick, Ph.D.



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Professor, Dean  
Healthcare Economics

M.D., Albany Medical College, Albany, NY  
M.P.A., Health Care, Seton Hall University, NJ  
B.S., Biology, Rutgers University, New Jersey



## Associate Dean, Basic Sciences

Dr. Hugh K Duckworth  
Professor  
Anatomy/Clinical Medicine

M.D., University of Tennessee, Memphis, Tennessee  
Surgical Residency, Methodist Hospital, Memphis, TN  
B.S., Zoology/Microbiology, Memphis State University



## Associate Dean, Clinical Medicine

Dr. Michael Eliastam

MB, BCh, (MD) University of Witwatersrand Medical School, Johannesburg, South Africa  
MPA, John F. Kennedy School of Government/Harvard University, Cambridge, MA


Ms. Susan Blanchard  
Finance Assistant

Alumni and Development  
Mr. Jonas Cope  
Alumni Coordinator

Computer/Media Specialist  
Lee Gregory  
IT Administrator (Saba  
Campus)

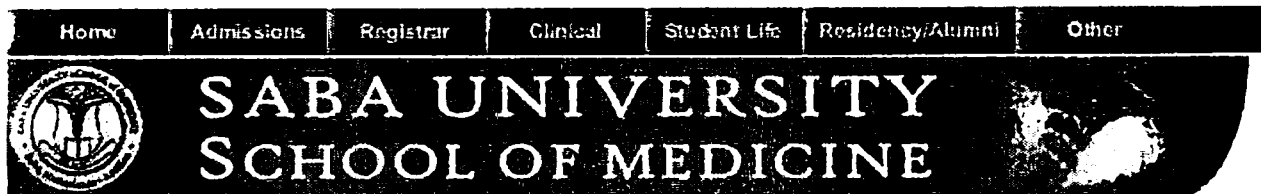
Michel Nation  
IT Assistant (Saba  
Campus)

Justin Kantor  
IT Administrator (US  
Office)

  
Board Of Trustees  
Paul L Dalbec, M.D.

 Pankaj Desai, M.D. 

William DiGiacomo, M.D.



Current Section 1

[Residency & Alumni](#)

## RESIDENCY & ALUMNI FORMS ONLINE

- [Click Here To Download The Alumni Update Form \(auf.pdf \[67kb\]\)](#)

David Aarons, M.D., Ph.D.

Internal Medicine  
Class Of 2005

Residencies  
Carraway Methodist Medical Center, Jefferson,  
AL

Mudasir Abro, M.D.

Family Medicine  
Class Of 2006

Residencies  
UMDNJ-Robert Wood Johnson Medical School  
Program, New Brunswick, NJ

Zulqarnain Abro, M.D.

Internal Medicine (Categorical)  
Class Of 2005  
[somiabro@hotmail.com](mailto:somiabro@hotmail.com)

Residencies  
University of Medicine & Dentistry of New  
Jersey (UMDNJ) - New Jersey Medical School,  
Newark, NJ

Angela Adelman, M.D.

Internal Medicine  
Class Of 2000

Current Status  
St. Joseph Hospital, Chicago, IL

States Of Licensure  
Illinois, California

James W Agnew, M.D., Ph.D.

Anesthesiology  
Class Of 1998  
[agnewgw@yahoo.com](mailto:agnewgw@yahoo.com)

Current Status  
Surgery Center for Medical Specialities, Vero  
Beach, FL

Residencies  
Afghanistan for the US Army  
Glades General Hospital, Belle Glade, FL  
St. Luke's Hospital-UMKC, Kansas City, MO

States Of Licensure  
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Bob Kam, M.D.

Anesthesiology  
Class Of 1998  
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Residencies  
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Rajiv Kandala, M.D.

Attending Physician  
Class Of 2000

Current Status  
Jackson Park Residency Program, Chicago, IL  
& Asst. Professor @ Chicago Medical School

Residencies  
Family Practice@Jackson Park Hospital,  
Chicago, IL

States Of Licensure  
Illinois, Arizona

Harris Kantor, M.D.

Internal  
Medicine/Anesthesiology  
Class Of 2005  
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Residencies  
Internal Medicine @Hospital of St. Raphael  
Program, New Haven, CT  
Anesthesiology @ Tufts-New England Medical  
Center Program, Boston, MA

Hany Kaoud, M.D.

Phychiatry  
Class Of 2003  
[drhanyaziz@hotmail.com](mailto:drhanyaziz@hotmail.com)

Residencies  
Pitt County Memorial Hospital/East Carolina  
University Program

Westbrook Kaplan, M.D.

Group Practice  
Class Of 2001

Current Status  
Las Vegas, NV

Residencies  
Internal Medicine@University of Nevada, Las  
Vegas, NV

Vanish Kapoor, M.D.

Surgery  
Class Of 1999

Current Status  
Medical College of Virginia, Richmond, VA

Prianka Kapur, M.D.

Internal Medicine  
Class Of 2002  
[pkapur@ochsner.org](mailto:pkapur@ochsner.org)

Current Status  
Alton Ochsner Medical Foundation, New  
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Attending Anesthesiologist  
Class Of 2000  
ekervenmd@comcast.net

Current Status  
Christ Hospital, Jersey City, NJ

Residencies  
Anesthesiology@St. Joseph's Hospital,  
Patterson, NJ

States Of Licensure  
New Jersey

Ali S Khalili, M.D.

Pediatrics  
Class Of 2006

Residencies  
Tulane University Program, New Orleans, LA

Abdul Khan, M.D.

Family Practice  
Class Of 2001

Current Status  
LSU Health Science Center, Shreveport, LA

Akbar A Khan, M.D.

Internal Medicine-Board  
Certified  
Class Of 1996

Current Status  
Faculty at UMDMJ/Robert Wood Johnson  
University Hospital, Hillsborough, NJ

States Of Licensure  
New Jersey, Michigan, Pennsylvania

Gouhar Khan, M.D.

OBGYN  
Class Of 2002

Current Status  
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Samina G Khani, M.D.

Internal Medicine  
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skucla2@hotmail.com

Current Status  
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Residencies  
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Program, Greenville, NC

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Class Of 2002

Current Status  
University of Minnesota, Waseca, MN



Varsha Morar, M.D.

Psychiatry  
Class Of 2000

Current Status  
St. Elizabeth's Hospital, Washington, DC

Residencies  
Chief Resident, 2003-2004

Joseph Morello, M.D.

Internal Medicine (Pre-Lim)  
Class Of 2005

Residencies  
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Urbana, Urbana, IL

Sabina Morgia, M.D.

Internal Medicine  
Class Of 2003  
[sabialex@yahoo.com](mailto:sabialex@yahoo.com)

Residencies  
St. Mary's Health Center Program, St. Louis,  
MO

Vickie Morgan, M.D.

Internal Medicine  
Class Of 2005

Residencies  
East Tennessee State University, Johnson City,  
TN

William Morgan, M.D.

Surgery  
Class Of 2002

Current Status  
Marshfield Clinic, Milwaukee, WI

Residencies  
Pre-lim Surgery@ Medical College of  
Wisconsin, Milwaukee, WI

Robert J Morgenthal, M.D., D.C.

Psychiatry  
Class Of 1998

Current Status  
Zephyrhills State Correctional Institute,  
Zephyrhills, FL

States Of Licensure  
Florida,

Marc Morresi, M.D.

Internal Medicine  
Class Of 2005

Residencies  
UMDNJ-New Jersey Medical School Program,  
Newark, NJ

Suzanne Morris, M.D.



OBGYN  
Class Of 1999

Current Status  
University of Las Vegas, NV

Residencies  
Chief Resident 2003-2004  
West Virginia University, Morgantown, WV

States Of Licensure  
Nevade, Arizona

Daniel Morrison, M.D.

Director of Emergency  
Medicine Ultrasound, Attending  
Physician  
Class Of 2001  
[Saba2home@yahoo.com](mailto:Saba2home@yahoo.com)

Current Status  
Albert Einstein Medical Center, Philadelphia,  
PA

Residencies  
2001-2004 Emergency Medicine Residency,  
Wayne State Univeristy, Sinai-Grace Hospital,  
Detroit, MI  
Chief Resident 2003-2004 (Wayne State)

States Of Licensure  
NJ, PA, GA, MI, DE

Faisal Motlani, M.D.

Family Medicine  
Class Of 2005  
[motlani\\_f@hotmail.com](mailto:motlani_f@hotmail.com)

Residencies  
SUNY Health Science Center at Syracuse/St.  
Joseph's Hospital Health Center Program,  
Syracuse, NY

Faisal Motlani, M.D.

Anesthesiology  
Class Of 2006

Residencies  
Wayne State University/Detroit Medical Center  
Program, Detroit, MI

Philip Moye, M.D.

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Class Of 2004  
[pwm0101@hotmail.com](mailto:pwm0101@hotmail.com)

Residencies  
New Hanover Regional Medical Center  
Program, Wilmington, NC

Abdul K Muhammad, M.D.

Internal Medicine  
Class Of 2001

Current Status  
Forest Park Hospital, St. Louis, MO

James M Murphy, M.D.

## Residencies

Pediatrics@University of Illinois, Chicago, IL

Amy Pearsall, M.D.

Family Medicine  
Class Of 2005

## Residencies

University of Massachusetts, Worcester, MA

David A Pepper, M.D.

Psychiatry  
Class Of 1999

## Residencies

University of Connecticut Program, Hartford, CT

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## Residencies

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## Residencies

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## Current Status

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Hospital Medical Center, Des Moines, IA

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Internal Medicine  
Class Of 2002

## Current Status

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NC

Sevastiani Petridou, M.D.

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## Residencies

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Internal Medicine  
Class Of 2001

## Current Status

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Class Of 2002Current Status  
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Sleep Disorder Medicine  
Fellowship  
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Current Status  
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Residencies  
Pulmonary and Critical Care  
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States Of Licensure  
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Current Status  
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States Of Licensure  
Alabama, Louisiana, Georgia, Florida,  
Washington

John Spence, M.D.

Radiology  
Class Of 2001

Current Status  
Methodist Hospitals of Memphis-Central,  
Memphis, TN

Residencies  
Surgery, Baylor University, Houston, TX

Angela Spencer, M.D.

Emergency Medicine  
Class Of 2005

Residencies  
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Center/Michigan State University, Grand  
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MO

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Family Practice, Board Certified  
Class Of 1997

Current Status  
Banner Churchill Community Hospital

Residencies  
Family Practice @ University of Wisconsin  
Medical School, WI  
Chief Resident-2002  
Psychiatry @ Case Western Reserve University,  
Cleveland, OH

Suraj Verma, M.D.

Family Medicine  
Class Of 2005

Residencies  
University of Nevada School of Medicine  
Program. Reno, NV

Vijayendra K Verma, M.D.

Interventional Cardiology  
Fellowship  
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Residencies  
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Internal Medicine @ University of Connecticut  
Health Center, Farmington, CT

States Of Licensure  
New Jersey

Sisirkumari Vettiyaden

Internal Medicine  
Class Of 2006

Residencies  
Seton Hall University School of Graduate  
Medical Education Program, South Orange, NJ

Herbert B Villaflores, M.D.